

From: Wilwerding, Joseph
Sent: Monday, March 18, 2019 09:21 PM
To: Mia, Marcia; Marsh, Karen; Ostrand, Laurie; Loukeris, Constantinos
Subject: RE: OELs

Ex. 5 Deliberative Process (DP)

60.482-6(b)

Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice

1595 Wynkoop Street, Denver, CO 80202-1129

(303) 312-6729, wilwerding.joseph@epa.gov

From: Mia, Marcia

Sent: Monday, March 18, 2019 2:10 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>

Subject: RE: OELs

My thoughts in red.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Marsh, Karen
Sent: Monday, March 18, 2019 2:24 PM
To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: OELs

To get back to some of the items you all have raised...

The OEL monitoring was not finalized in VVa. I don't remember the specifics on why, but it wasn't finalized.

We proposed the 300 hr/yr exemption in 0000a in October. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

I think a question that Brandon is raising is whether that second valve that is acting as the closure device is required to be monitored. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Wilwerding, Joseph
Sent: Monday, March 18, 2019 1:25 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: OELs

Hi Karen, without a lot of heavy parsing, a few thoughts:

Is this a question about difference between KKK/VV/0000/a/VVa regarding open-ended lines? I don't see the 'not in VOC service 300 hrs/yr or more' language in sections referenced by KKK and 0000/a.

Ex. 5 Deliberative Process (DP)

Hope that helps,

Joe

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice

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From: Marsh, Karen

Sent: Friday, March 15, 2019 1:32 PM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: OELs

I think more asking about experience or thoughts in general.

Karen R. Marsh, PE

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Friday, March 15, 2019 2:43 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Subject: RE: OELs

Hi Karen

I haven't done any research on OELs and I don't have any further thoughts on what's written below. The words in italics below is EPA's language, i.e., what has been or would be put into a preamble. Correct?

Were you asking us to research this or just wondering if we had any first-hand knowledge regarding this issue?

Thanks

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Marsh, Karen

Sent: Thursday, March 14, 2019 9:22 AM

To: Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: OELs

Getting this back on the radar for you all. Thank you Kosta for your thoughts. Joe or Laurie, do you have any additional thoughts on this one?

Karen R. Marsh, PE

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Loukeris, Constantinos

Sent: Wednesday, December 19, 2018 2:32 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: OELs

My initial reaction to his statements below are as follows:

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Hope this helps,

Kosta

From: Marsh, Karen

Sent: Wednesday, December 19, 2018 10:17 AM

To: Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: OELs

Any thoughts on this one? This would actually be bigger LDAR picture, and not just gas plants.

Karen R. Marsh, PE

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Brandon Mogan, PE <bmogan@toraconsulting.com>

Sent: Wednesday, December 19, 2018 10:50 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: OELs

Karen:

I wanted to shoot you a quick note on the treatment of open-ended valves or lines (OELs). The historic basis of OEL regulation (NSPS VV/VVa) was related to emissions leaking past the seat of a normally closed valve (through-valve leakage). Instead of requiring monitoring of these components to reduce emissions, the regulations require OELs to be eliminated (equipped with a second valve, plug, or flange). Once you put a second valve, plug or flange on an OEL, it no longer meets the definition of an OEL.

See below from the NSPS 0000a preamble:

In the preamble to the final 2012 rule, the EPA stated that subpart VVa lowered the concentration limit defining a leak from 10,000 ppm to 500 ppm. The EPA's action did not revise subpart VVa, but rather changed the application of leak detection and repair provisions by making the LDAR standards of subpart VVa applicable to affected units subject to LDAR under subpart 0000 if the concentration emanating from a leak is 500 ppm or greater. The EPA further stated that monitoring requirements from subpart VVa applied to pumps, pressure relief devices, and open-ended valves or lines at units affected by LDAR under subpart 0000. Although the preamble may have obscured the issue, we clarify here that the monitoring provisions of subpart VVa applicable to affected units of subpart 0000 do not extend to open-ended valves or lines. Given this clarification of preamble language, the EPA can identify no need to modify the regulatory language in response to this petition.

Apparently there has been some confusion on this topic and in the above excerpt the EPA confirms that there are no monitoring requirements for OELs. Some in industry would say that they don't have to monitor a valve that is associated with a former OEL because it has a second valve. This is faulty logic and is inconsistent with the intent of the regs. Leaks from valves are reduced via monitoring. Leaks through valves are reduced by eliminating the OEL.

Our interpretation is that the first valve, which is in contact with process fluid, still qualifies as the "valve" equipment type and must be monitored as such. The second valve, plug, or flange, which is behind a normally closed valve, should not have any process fluid touching it and is therefore not considered "equipment" (not in VOC or in wet gas service). As such, the component eliminating the OEL (second valve, plug, or flange) is not subject to monitoring. Is this consistent with the intent? If so, to minimize confusion, maybe add the following clarification somewhere (i.e., the preamble of the revision to NSPS 0000a)?

The EPA would like to clarify the intended compliance approach for open-ended valves or lines. The equipment leak standards of subpart VV and subpart VVa require that open-ended valves or lines be eliminated via the installation of a second valve, plug, cap, or blind flange. The monitoring requirements do not apply to the "open-ended valves or lines" equipment type because there should not be any such equipment. The lack of monitoring requirements specific to the "open-ended valves or lines" equipment type should not be misconstrued to exempt individual components associated with a former open-ended valve or line from otherwise applicable monitoring requirements. For example, the first valve (normally closed) associated with a former open-ended valve or line would be subject to the applicable monitoring requirements of subpart VV or subpart VVa if it meets the definition of "equipment". The second valve, plug, cap, or blind flange used to eliminate the open-ended valve or line would not meet the definition of "equipment" and would be exempt from monitoring requirements because it would not be in contact with process fluid (not in VOC service or in wet gas service).

Hope you are doing well, sorry for the ramblings, and Merry Christmas!

Regards,

Brandon Mogan, PE
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